

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CRIMINAL DOCKET NO. 04-30046

UNITED STATES OF AMERICA)
Plaintiff)
)
vs.)
)
Albert Innarelli, Michael Bergdoll, Anthony Matos,)
Pasquale Romeo, Wilfred Changasie, Theodore Jarrett,)
Mark McCarthy, James Smith, Jonathan Frederick and)
Joseph Sullivan)
Defendants)

MOTION OF THE DEFENDANT JOSEPH SULLIVAN
TO MODIFY CONDITIONS OF RELEASE

NOW HERE COMES the defendant, Joseph Sullivan, and moves that the conditions of his pretrial release restricting his travel to the Commonwealth of Massachusetts be modified. Defendant seeks permission to travel to Topsail Island, North Carolina for a family vacation between the dates of August 12, 2005 and August 22, 2005. As grounds therefor, the defendant states that his brother has recently been redeployed from Iraq to Camp Lejune, North Carolina, and as such the family is traveling to Topsail Island, North Carolina to visit with him.

WHEREFORE, the defendant respectfully moves that this motion be allowed.

THE DEFENDANT
JOSEPH SULLIVAN

By /s/ Daniel D. Kelly
Daniel D. Kelly, Esq., of
Robinson Donovan, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
Phone (413) 732-2301 Fax (413) 785-4658
BBO No.: 634648